

“Mobile Justice”: A Study of the Effects of Transportation Projects on Manufactured Home Parks

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Table of Contents:

Introduction	1
The Impact of Road Projects on Manufactured Home Parks	3
The Impacts of Relocation	5
<i>Case Study of Arden Hills</i>	8
Overview of Road Project and Decision Making Process	8
Resident Involvement in the Process	10
Grassroots Organizing in Arden Hills	11
Finding Win-Win Solutions	12
<i>Case Study of Chaska/Shakopee</i>	14
Overview of Proposed Bridge Routes	14
Assessing Social Impacts	15
Grassroots Organizing in Chaska/Shakopee	16
Resident Interests Marginalized	17
Overview of Similarities Between Arden Hills and Chaska/Shakopee	18
Legislative Solutions	19

Introduction

Manufactured Home Parks are one of Minnesota's most valuable sources of affordable housing. There are more affordable housing units in Manufactured Home Parks (MHP's) than there are Housing and Urban Development (HUD) subsidized units and Rural Development units combined. Statewide, there are over 900 licensed parks in which nearly 180,000 residents live. According to HUD guidelines, 80% of these residents fall within low to very-low income brackets.

With monthly lot rental costs averaging \$367, MHP's provide housing at a considerably more affordable rate than stick-built homes and apartment units. At a time when rising housing costs are a burden for nearly 300,000 Minnesotans and studies predict a shortfall of over 33,000 affordable housing units by the year 2010, the need for this viable source of affordable housing is all the more critical.¹

In addition, MHP's in Minnesota are 87% owner occupied. The mean value of owner occupied units is \$34,666 - a fraction of the cost of purchasing a traditional stick-built home. This affordability of park housing combined with the opportunity for home ownership encourages long term residency, and therefore greater ties to and investment in the community. Indeed, statewide, 42% of residents have been living in their current community for more than 14 years.

Residents of well-maintained parks repeatedly describe their communities as friendly, quiet places, as a good place to raise a family, and as the best affordable housing option. Strolling through Bonnevista Terrace on a sunny day, one would surely confirm these sentiments having seen the beautiful homes, the landscape rich with trees and

¹ "The Next Decade of Housing in Minnesota," Prepared by BBC Research and Consulting for the Family

plants, and the families walking their dog or happily enjoying an outdoor barbeque. This is the picture that I saw time and time again in my visits to MHP's. Yet, this is not the picture most people initially imagine.

Despite the value of MHP's as a source of affordable housing and as quality neighborhoods, public perception at large is heavily prejudiced against MHP's and Park residents. All Parks Alliance for Change (APAC) documents countless examples of children being called "trailer trash" at school, people being made fun of by their friends and family, and employers discriminating against job applicants, all because of the neighborhood they choose to live in.

Meanwhile, TV shows like COPS and Jerry Springer constantly perpetuate and reinforce these negative stereotypes. Over time, park prejudice is institutionalized in societal norms and in public policy. In 2007, one State Legislator from Shakopee wrote a negative opinion regarding proposed relocation compensation amendments on his website in which he quoted the theme song of the Beverly Hillbillies.

After Shady Lane Court in Bloomington closed, displacing 50 families, the Mayor responded to criticism by stating: "Maybe some people just can't afford to live in Bloomington". With all the low-paying service sector jobs in Bloomington, one would think that affordable housing would be a top priority. Yet the trend of displacing MHP residents for development and transportation projects continues increasingly.

Since 2000, 1503 park residents have been displaced by park closures. Displaced residents often have difficulty finding affordable housing, as MHP's continue to close without replacement. Truly, the Manufactured Home Park is becoming an endangered

Housing Fund, Minnesota Housing Finance Agency and the Greater Minnesota Housing Fund; "Determining Affordable Housing Need in the Twin Cities 2011-2020," Metropolitan Council.

species. The precarious position of residents who own their homes but rent their land is one in need of legislative attention. Insofar as we value the need for viable affordable housing and we respect resident's rights to housing, we need to cast aside negative biases about "trailer parks" and find ways to keep these communities alive.

The Impact of Road Projects on Manufactured Home Parks

Among the greatest threats to MHP's are road construction and road expansion projects. The Minnesota Department of Transportation (MN DOT) builds, expands, and improves roads to accommodate increasing traffic flow and to provide a safe, economically efficient transportation infrastructure. However, MN DOT projects often have adverse social, ecological, economic, and noise pollution effects.

Recognizing this fact, the National Environmental Policy Act (NEPA), passed in 1972, requires completion of an Environmental Impact Statement (EIS) whenever a project that uses Federal funding could potentially have detrimental effects. The development of an EIS is a process which takes place over several years, during which City and County officials are included in meetings and updated regularly on potential impacts. Findings from the Draft EIS are then reviewed by State and local officials during a comment period. These comments are taken into consideration as Preferred Alternatives, and are assessed by MN DOT for their viability and Environmental Impact.

The Final EIS includes a commitment to mitigate adverse impacts. Ideally, the result of this process is that the road project decided upon will have minimal negative impacts, including the displacement of MHP residents. However, there are often a number of significant flaws and faulty assumptions in the EIS, which distort the extent to

which road projects will have detrimental effects.

One assumption of the EIS is that, if a manufactured home is disrupted in part, the remainder of the MHP will continue to operate. For many MHP's, displacing some home owners will lead to the closure of the entire park. By failing to address the likelihood of entire MHP's ceasing operation, MNDOT significantly underestimates the extent of proposed road project impacts. Another environmental justice impact not adequately addressed is the decrease in quality of life for parks that are able to remain partially open. The increased levels of noise and pollution that result from proximity to high-traffic road projects often fall directly on low-income communities, including MHP residents.

Additionally, EIS's often misrepresent disproportionate impacts on minority populations. For example, in EIS for a proposed bridge project in Shakopee, MN DOT used data from the 2000 census to document the percentage of households in Jackson Heights who identify as Latin at 60% - current figures indicate that the Latino population of Jackson Heights is 90%. These and other misrepresentations significantly underestimate the adverse impacts of road projects.

Based on CURA data, proposed MNDOT road projects for 2008 alone could adversely impact as many as 12 MHP's in the 7-County Metro Area.² The need for improved transportation systems must be balanced with the rights of residents. In the process of planning and approving road projects, city officials have a voice. In fact, many projects cannot be approved without municipal consent. Though MN DOT often uses political power to get projects approved, the city does exert some degree of control. A prominent example is the conflict between the city of Minneapolis and MN DOT over

² See map of proposed MNDOT projects with MHP's marked by location. Some of these projects won't necessarily eliminate homes, though proximity indicates that the projects will likely have an effect on

a highway 62 cross-town project in which the city withheld municipal consent until MN DOT agreed to dedicate a lane to buses during rush hour. However, despite the capacity of the city to influence road projects, this power is rarely exerted in the interest of MHP's. Many cities regard the increased tax base that results from development spurred by major road projects as an incentive to approve projects despite adverse impacts on residents. All too often, residents who could potentially be displaced by these projects are left out of the process.

Many of the Concept Planning meetings are held privately between MN DOT representatives and city officials - public access is not permitted. Additionally, when cities inform residents of public meetings to discuss road projects, they often downplay or fail to address the possibility of the project destroying homes. Speaking anecdotally, many of the residents surveyed in Arden Manor were unaware of the possibility that they may be displaced until APAC began organizing in their community. This failure on the part of cities and MN DOT to communicate with residents and include residents in the process translates into road projects which unnecessarily impact residents in a negative way.

The Impacts of Relocation

When residents are displaced by road projects, they often face economic hardship. Displaced residents are compensated by the Uniform Relocation Act (URA). If the home can be moved to a new site, the actual costs of doing so may be eligible under the URA. If it cannot be moved, it may be acquired, as if it were real estate. Assuming the home is owned and the site is rented (which is the case for the vast majority of Park residents), the

owner may be eligible for a payment equal to the difference between the acquisition price of the current home and the cost of a comparable home. Additionally, the URA compensates the difference between the current site rent and a comparable site rent for a period of 42 months.

There are a number of problems with this legislation. First, residents who are displaced are often unable to relocate their actual home. The majority of MHP's will not accept homes that are more than 10 years old. In the Twin Cities area, only 25% of homes are 10 years old or newer, while nearly 50% of homes are more than 20 years old. For those homes over 20 years old, it is questionable whether they could withstand the stress of a move. For any home, regardless of age, moving the home increases the likelihood of structural damage. Additionally, there are very few options for placing a manufactured home in the community. Space is increasingly limited in MHP's, and zoning regulations generally do not allow manufactured homes to be placed elsewhere.

Often, residents have invested considerable sums of money in home improvements. Some residents build porches, some landscape their property, and some remodel their homes. These improvements are often unaccounted for or underestimated in the appraisal of the home's acquisition price. Additionally, when residents are forced to relocate to apartments, they often face rent which is considerably more expensive than that of their Manufactured Home lot rental. The URA covers the difference in rent for 42 months, but what are low-income residents to do after this time, when they are burdened with an additional \$500 or more every month? In these cases, residents not only lose their status as homeowners, but also struggle to pay rent as tenants.

The URA also fails to provide compensation for residents who are not specifically

within the construction zone, but will be displaced as a result of the closure of the MHP. These individuals face the same loss as other displaced residents, but they are not provided with the resources to access adequate replacement housing. When individuals are not compensated under the URA, their only source for relocation compensation is the Minnesota Manufactured Housing Relocation Trust Fund. Essentially, this requires low-income park residents across the state, through their annual contributions to the trust fund, to pay for MN DOT's decision to displace park residents.

There are additional impacts which are unaccounted for, both in EIS reports and in URA compensation. First, many residents in MHP's work in the same community in which they live. Often, when residents are displaced, there is no available affordable housing in their community - they are forced to relocate considerably further from their work. This places a financial burden on displaced residents, as it increases commuter costs. Also, this further contributes to traffic congestion. If MN DOT seeks to relieve traffic congestion, they ought to encourage local, community centered infrastructure, rather than forcing people to drive greater distances to work.

Second, there are social impacts which are unaccounted for. The "Kids Mobility Project Report", published by the Family Housing Fund, concludes that housing mobility has been linked to serious declines in educational achievement.³ Not only will children lose their homes and social networks, but many will be forced to move to a different school district. This has further detrimental effects on educational achievement. There are also health burdens on displaced senior citizens. Relocation stress syndrome, a well-documented condition resulting from displacement, includes symptoms such as

³ Kids Mobility Project Report, available at http://www.fhfund.org/_dnld/reports/kids.prd

exhaustion, sleep disturbance, anxiety, depression, and disorientation.⁴ If we are to take seriously the impact that displacement has on residents, and on society at large, these things must be accounted for.

Case Study of Arden Hills

Overview of Road Project and Decision Making Process

Over the last year and a half, the city of Arden Hills has been discussing a proposed grade separation to Highway 10 and County Road 96 to correct safety concerns, which are a mutual concern of the city and MN DOT. The intersection is currently ranked #21 on MN DOT's list of the top 200 accident-prone interchanges in the State. Additionally, they have been discussing the need to improve local access to area residents onto Highway 10.

Throughout the process, various designs for addressing these matters have been considered. One concept proposed by city staff was discussed at the September 17, 2007 Council work session. It appeared to minimize impacts to the Arden Manor neighborhood, an MHP located in the "triangle" between I-35W, Hwy 10, and County Rd 96. However, MN DOT did not support this design because it left driveway access points on Hwy 10, which are stated as a safety concern.

⁴ Tracy Green Mintz, Relocation Stress Syndrome in Older Adults, *Social Work Today*, Vol. 5, No. 6.

MN DOT was then asked to have their Engineers take an independent look at the area and design some new alternatives that would reduce impacts to the Arden Manor neighborhood. At the January 22, 2008 Council work session, MN DOT's new plan was presented; however, it was determined to be more intrusive to Arden Manor than the original concept design prepared by SEH, dated July 23, 2007. The original plan, a diamond interchange, would eliminate 48 homes in Arden Manor.

Many feel that the impact on residents could be minimized by moving the Hwy 10 interchange further north, however, this possible solution has been rejected, as it would cut into land that is planned for development on the Twin Cities Army Ammunitions Plant (TCAAP) site. Originally farm land, the TCAAP site was seized by the military as an ammunitions plant during World War II. Though the plant has long since closed down, the polluted, empty land remains. To the North of Hwy 10, extraction wells sit, draining toxic pollution from TCAAP. Though one possible solution would be to divert road construction around the extraction wells, this option is not being considered, as the city of Arden Hills has plans to develop 585 acres of the TCAAP site for commercial and residential use.

Developers who stand to profit tremendously, and city officials who see the drastically increased tax base that results from development as an incentive, do not want the road to cut into TCAAP land. Though many city officials, particularly those on the city council, seem genuinely concerned about the interests of Arden Manor residents, those interests of development which refuse to address resident's needs seemed to prove more powerful in the process of concept design.

Resident Involvement in the Process

After deciding upon a plan which would displace 48 families, the city decided to invite residents to a “spaghetti dinner”, during which they would be told that they needed to be relocated. According to Arden Manor resident Kristy Effinger, “Though the city says they sent a postcard, most of us don’t remember getting it. It was vague and it certainly said nothing about homes being destroyed. It irritates me that the city seemed to have no intention of letting us know.” Residents were not included in the process of planning, and they were not adequately informed of the risk to their homes. In fact, many residents were unaware of the threat to their homes until APAC organizers began knocking on doors, handing out flyers, and organizing the Resident Association.

At this point, residents began going to city council meetings, however, their capacity to participate was severely limited. Every two weeks the council has regular meetings which allow a brief period of public commentary beforehand. On all other weeks, the city holds work sessions which can only be attended by invitees - the resident association of Arden Manor was generally not invited. When asked how park residents can be included in the city decision making process, one city staff member suggested that they could watch council meetings on the local cable station.

It is no wonder that only 15.4% of residents surveyed feel that the city has done everything in their power to protect residents. Residents are not included in the process. 91.3% of residents do not support the current plan - a plan that will directly impact their lives. This is cause for concern. Among the core values of Arden Hills listed on the city’s website are: community involvement, inclusive communication, community-based planning, and respect for human dignity and rights. Despite the efforts of some council

members to accommodate MHP residents, the overall process has fallen short of building and maintaining these core values.

Grassroots Organizing in Arden Hills

Through the power of community organizing, Arden Manor residents were able to get their voices heard and win 2 important victories. In January, 2008, APAC and the Arden Hills resident association organized approximately 100 people to attend a council meeting at which the city was to vote on the proposed concept plan. It was presumed by residents, a number of city officials, and organizers, that the city would approve the plan, eliminating 48 homes. However, as residents continued making their case to the city, council members grew increasingly sympathetic, and ultimately voted against the plan 4 to 1. Mayor Stan Harpstead, a major proponent of TCAAP development, cast the only vote in favor of the plan.

The following month, despite not having an approved plan, members of the Minnesota Senate Capital Investment Committee were invited to Arden Hills to hear city officials make a pitch for \$29 million in funding for the Hwy 10 and County Rd 96 road project. Over 30 picketers from Arden Manor showed up to protest. The event got a great deal of media attention: stories circulated in the Star Tribune, the Pioneer Press, the Minnesota Sun, and a variety of other papers, as well as on cable television.

Following this controversial meeting, residents from Arden Manor lobbied Senators and Representatives at the State Capitol, requesting that they deny funding for this controversial and potentially detrimental project. Residents tensely awaited the release of the Capital Investment Committee's 2008 Budget Appropriations - to their

satisfaction, the city's request for bonding money was denied. This demonstrates the power of community organizing and political action in impacting public policy.

Finding Win-Win Solutions

By and large, residents are in favor of the development of TCAAP and are supportive of a grade separation to the 10/96 intersection, as development would benefit Arden Hills and the intersection must be made safer. However, they do not support a plan which destroys homes. Such a plan not only adversely affects individuals, it makes little sense as pragmatic policy. Arden Hills is already lacking in affordable housing. In order to meet commitments to Livable Community Act goals, Arden Hills needs to build a total of 749 affordable housing units by the year 2020. Though the city has committed to establishing some affordable housing on the TCAAP site, it is not nearly enough to meet these commitments. Particularly if Arden Hills wishes to add commercial development in the service sector, it would be in the city's interest to maintain affordable housing for low-income, service sector workers. Eliminating 48 low-income homes without replacement is not responsible city planning, and it will not help Arden Hills reach their goals on affordable housing.

Additionally, according to our survey, the average distance Arden Manor residents drive to work is 10.45 miles. A number of residents work in or near Arden Hills - indeed, less than 1/4 of residents surveyed commute more than 20 miles. If these residents are displaced, it could mean a loss in jobs, as well as increased traffic congestion.

One may counter by arguing that the benefits of the current road construction plan outweigh the burdens, and thus it is justified. However, engaging exclusively in this cost-benefit analysis obscures real world consequences. When the costs are not merely numbers, but people's homes, we must consider the depth of the impact of these projects on real people's lives. Kristy Effinger, Secretary of the Resident Association, has been living in Arden Manor for 29 years. Her and her husband moved there when they were young and had 2 young children. Because Kristy wanted to stay home and take care of her kids, the family lived on a single income, and a stick built home was not affordable. They were drawn to the neighborhood because "the street was quiet, there were a lot of young couples with kids, and they could play in the neighborhood without us worrying. It was a really safe place." Now that their kids are grown up, Kristy and her husband enjoy living in the neighborhood because it is "a peaceful place with a great mix of people", and it's the "best source of affordable housing available". As her husband approaches retirement, Kristy worries about their financial future, if they are forced to move. Kristy, like many of the other residents of Arden Manor, enjoys living in her own home in her own neighborhood. She would like to see a win-win situation in which the road gets improved, TCAAP gets developed, and residents are able to stay in Arden Manor. Regarding any other plan, Kristy maintains that "destroying our homes isn't progress". Surely, she's not the only one who feels that way.

Case Study of Chaska/Shakopee

Overview of Proposed Bridge Routes

Arden Manor is not the only MHP threatened by MN DOT road projects - in Chaska and Shakopee, proposed bridge projects connecting Highway 212 to Highway 169 threaten nearly 500 mobile homes. According to MN DOT figures, existing Highway 41 will carry more than 36,000 cars every day, nearly doubling today's average daily traffic, by the year 2040. Thus, a bridge is needed to provide traffic relief. MN DOT engineers have drafted six possible routes for the bridge.

Five of these six routes have disparate impacts on MHP's. Options E-1 and E-1A would affect the most homes - they would directly eliminate 261 homes including 126 mobile homes. The other Eastern route, option E-2, would directly eliminate 182 mobile homes. All of the Eastern routes impact homes in three MHP's: Mobile Manor, Bonnevista Terrace, and Riverview Terrace. It is likely that these MHP's may close as a result of the bridge project. Thus, choosing an Eastern route could eliminate up to 471 affordable homes. As is the case in Arden Hills, there is a huge unmet affordable housing need in this region. Eliminating nearly 500 manufactured homes is not a viable solution to this housing shortage. Additionally, the Eastern Routes impact Seminary Fen, a rare calcareous fen with numerous threatened and endangered species. Though Scott County and the city of Shakopee support the Eastern Route, these negative social and ecological effects make it an unappealing option for many.

The central routes don't fare much better. Both of the Central routes would eliminate Jackson Heights, a MHP containing 65 homes. Option C-2 would also cross

over Athletic Park, a historic park which qualifies for the National Register of Historic Places. Option C-2A impacts 124 acres of natural and park land, as well as eliminating a total of 78 homes and 12 businesses. By contrast, the Western route, W-2, causes the least amount of impact on residents - only 13 homes are affected by the route, none of which are manufactured homes. Additionally, the Western route is the shortest in height, and one of the cheapest options. On the other hand, this option would cross through the Minnesota Valley National Wildlife Refuge, splitting the reserve in two. According to MN DOT, all six alignments would provide “similar relief” to the highway.

Assessing Social Impacts

The disparate impacts of each of MN DOT’s proposed alignments have spurred great controversy and intense debate. As there are a variety of competing interests, a determination as to which route is the best is difficult. Lynn Clarkowski, MN DOT South Metro Area Manager, has stated that “we’ll be looking for the option that minimizes impact or mitigates impact”.

In determining the impacts of various routes, MN DOT conducted a Draft EIS, which was released for public comment in the summer of 2007. There were a number of problems with MN DOT’s assessment. As discussed earlier, MN DOT used data from the 2000 census to determine impacts on people of color. Though MN DOT recognized that the Central routes would have disproportional effects on minorities, the 2000 census data under-represents the extent to which this is the case. According to MN DOT, 60% of residents in Jackson Heights self-identify as Latino. However, according to a survey conducted by APAC, 95% of residents in Jackson Heights self-identify as Latino. If MN

DOT chooses either of the Central routes, Jackson Heights, an overwhelmingly Latino park, will be eliminated. For a state or federal agency to knowingly choose an alternative which will have disproportionately negative effects on minorities is to invite liability under the Fair Housing Act. (42 U.S.C. 3604) This racial inequity is something worth particular attention, considering the fact that, while only 10% of park residents in Minnesota are people of color, 54% of residents who have been displaced by park closings are people of color.

For residents of Jackson Heights, the current lot rent of \$375 represents one of the few truly affordable unsubsidized housing opportunities in the communities of Shakopee and Chaska. Thus, the Central routes do not seem to be feasible. Nonetheless, MN DOT has publicly stated that they are leaning towards an alternative C-2, which avoids direct impact to the athletic field, but displaces residents from Jackson Heights, nonetheless.

Grassroots Organizing in Chaska/Shakopee

Given the disparate social impacts of both all the Central and Eastern routes, a number of public interest groups have rallied in protest. During the 6-week period of public comment after MN DOT released the Draft EIS, APAC organized by going door to door and holding a postcard campaign. As a result of these efforts, 587 residents sent comments to MN DOT in opposition to the Central and Eastern routes. On August 6, 2007, residents rallied at Fireman's Park in Chaska to demand that their interests are considered in the debate about where to build the bridge. They were joined by local religious leaders, the East Chaska Citizens neighborhood group, the Sierra Club North Star Chapter, the Housing Preservation Project, and the Alliance for Metropolitan

Stability. Residents of MHP's clearly support the W-2 route, as it is the only option which does not displace residents. The city of Chaska has also been quite vocal about their support for the W-2 route. As the City argues, W-2 has the highest cost/benefit ratio, it has the least impact on low and moderate income housing, it has low impact on existing properties and businesses, it has the least impact on city parks and trails, and it has the least impact on Seminary Fen. However, despite this vocal support for the W-2 route and a great deal of protest against other options, the discourse among MN DOT representatives in consideration of the W-2 route has been limited.

Resident Interests Marginalized

Although the preferred C-2 route instigated controversy over both the destruction of Athletic Park and the destruction of Jackson Heights, MN DOT seems willing only to construct an alternate route sparing the former. This illustrates the extent to which the voices of MHP residents are marginalized in the process. As Paul Westveer, resident of Bonnevista Terrace, put it, "They treat us like second class citizens. We just want the State to recognize us as human beings, equal to anyone else." That such a small request proves so difficult to honor should be a subject of great concern in the crafting of public policy.

Overview of Similarities Between Arden Hills and Chaska/Shakopee

The processes taking place in Arden Hills and in Chaska/Shakopee share a number of striking similarities. Both involve projects which could potentially displace residents. In both cases, there seems to be options available which do not displace residents, yet, MN DOT continues to strongly advocate those which do. As a result, both Arden Hills and Chaska/Shakopee road projects have spurred great controversy - they have catalyzed organizing efforts on the part of a diverse array of public interest groups, and they have attracted a fair amount of media attention.

Additionally, both projects share a similar lack of public inclusion and lack of community agreement in the process. Despite the fact that these projects involve a variety of actors with a variety of interests, it seems as though the interests of MHP residents are marginalized in exchange for the voices of more financially powerful interests. Given the lack of affordable housing in both regions, and the need to accommodate low-income housing, especially for areas seeking to spur economic growth, options which eliminate MHP's and do not replace them are not responsible planning and development strategies.

Legislative Solutions

One possible solution to this problem would be legislation requiring MN DOT to provide 1-for-1 replacements within city limits for any displaced homes. This would mitigate the damage inflicted upon residents. It would guarantee that they are allowed to stay in the communities in which they reside and work, and it would ensure that residents are able to continue living in MHP's as homeowners, if they choose to do so.

This option would also help in ensuring that affordable housing goals are met. When MHP's are continually eliminated without replacement, it places significant constraint on the availability of affordable housing. 1-for-1 replacements guarantee that affordable housing is at least maintained. It requires that cities set aside land for the establishment of new parks, if necessary, however, most cities already have land that is planned as a site for affordable housing development.

Cities recognize that it is in their interest, as well as the interest of the overall community, to make affordable housing available - often they are unable to do so only because it can be a cost burden, particularly when city land is prime real estate and other uses lead to greater wealth maximization. If MN DOT, an agency whose financial resources make it possible to provide replacements, were required to fund replacements within city limits when they are responsible for displacing MHP residents, the goal of maintaining community ties and ensuring the availability of affordable housing within cities would become more feasible.

Additionally, requiring MN DOT to pay the expense of 1-for-1 replacements would act as a disincentive to eliminate MHP's. Currently, it is often economically advantageous for MN DOT to build roads through MHP's, as the cost of compensation

for MHP residents is considerably lower than the cost of compensation for the elimination of stick-built homes, businesses, or other sites. The relatively low economic burden on MN DOT for the elimination of MHP's may partially explain why so many road projects are routed through these neighborhoods. If legislation required MN DOT to pay for 1-for-1 replacements, displacing residents would be a greater economic burden, thus giving them incentive to find other, less socially damaging routes.

Finally, the availability of 1-for-1 replacements would correct a significant inequity between residents of MHP's and those of traditional homes. Where residents of stick-built homes, even if displaced, are compensated at a rate which allows them to (most likely) find housing within city limits, MHP residents do not have this luxury. Many are forced to move as far as 50 miles away in order to find another park. As we've discussed, this is detrimental, both to residents and to the larger community. Providing replacements within the community simply offers residents the same opportunity that other homeowners have.

The scope and the scale of this legislative change is debatable. Should MN DOT be accountable to provide replacements only for MHP residents, or should these requirements apply to all forms of affordable housing? Should this obligation be restricted to MN DOT, or should it apply to other government agencies? These are important questions, worthy of lengthy consideration. Over time, they will need to be worked out, as a just society requires that burdens and benefits be distributed fairly. However, for the time being, even a small change that increases the availability of affordable housing, decreases the burden on displaced residents, and provides a disincentive to forcing residents out of their homes should be welcomed. Though the

process of city planning and development may not be entirely equitable anytime soon, we can at least take a step in the right direction.